IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

SYLVESTER ALLEN, JR., et al.,

Plaintiffs,

1:20-cv-0997-CCE-LPA

v.

CITY OF GRAHAM, et al.,

Defendants.

STIPULATION OF DISMISSAL

All parties to the above-captioned action (the "Allen Action"), acting through counsel and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby stipulate, in consideration of a negotiated settlement executed between them, to the Dismissal with Prejudice of the Allen Action, with each party to bear its own attorneys' fees and costs. For the avoidance of doubt, this Stipulation of Dismissal is in the Allen Action only and does not impact the separate action captioned Drumwright, et al. v. Cole, et al., 1:20-CV-00998, which was consolidated with the Allen Action.

Dated: June 25, 2021 Respectfully submitted,

/s/ Geraldine Sumter
Geraldine Sumter
North Carolina Bar No. 11107
gsumter@fergusonsumter.com
Ferguson Chambers & Sumter, P.A.
309 East Morehead Street, Suite 110
Charlotte, NC 28202
Tel.: (704) 375-8461

Leah Aden*
laden@naacpldf.org
Natasha Merle*
nmerle@naacpldf.org
Anuja D. Thatte*
athatte@naacpldf.org
Ashok Chandran*
achandran@naacpldf.org
NAACP Legal Defense &
Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10031
Tel.: (212) 965-2200

C. William Phillips*
cphillips@cov.com
Covington & Burling LLP
620 8th Avenue
New York, NY 10018
Tel.: (212) 841-1081

Marianne Spencer*
mspencer@cov.com
Covington & Burling LLP
850 Tenth Street, N.W.
Washington, DC 20001
Tel.: (202) 662-6000

Morgan Lewis*
melewis@cov.com
Covington & Burling LLP
415 Mission Street
San Francisco, CA 94105
Tel.: (415) 591-6000

Attorneys for Allen Plaintiffs

*Notice of Special Appearance Filed

/s/ Anthony Biller
Anthony Biller
North Carolina Bar No. 24117
ajbiller@envisage.law
Envisage Law
2601 Oberlin Rd., Suite 100
Raleigh, North Carolina 27608
Tel.: (919) 755-1317

Attorney for City of Graham Defendants

/s/ William L. Hill
William L. Hill
North Carolina Bar No. 21095
whill@frazierlawnc.com
Frazier Hill & Fury, RLLP
POD 1559
Greensboro, NC 27402
Tel.: (336) 378-7787

Attorney for Alamance County Defendants

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day filed the foregoing *Stipulation of Dismissal* with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to the following attorneys of record in the consolidated actions:

Anuja D. Thatte, athatte@naacpldf.org
Ashok Chandran, achandran@naacpldf.org
Clarence W. Phillips, cphillips@cov.com
Marianne Spencer, mspencer@cov.com
Leah Aden, laden@naacpldf.org
Morgan Lewis, mlewis@cov.com
Natasha Merle, nmerle@naacpldf.org
Attorneys for Allen Plaintiffs

Anthony Biller, ajbiller@envisage.law
Adam P. Banks, abanks@envisage.law
James R. Lawrence, III, jlawrence@envisage.law
Attorneys for City of Graham Defendants

William L. Hill, whill@frazierlawnc.com Clyde B. Albright, clyde.albright@alamance-nc.com Patrick Houghton Flanagan, phf@cshlaw.com Paul Gerard Gessner, pgessner@cshlaw.com Attorneys for Alamance County Defendants

Elizabeth Haddix, ehaddix@lawyerscommittee.org
Daniel K. Siegel, dsiegel@acluofnc.org
Jaclyn A. Maffetore, jmaffetore@acluofnc.org
Kristi L. Graunke, kgraunke@acluofnc.org
Mark Dorosin, mdorosin@lawyerscommittee.org
Jennifer N. Nwachukwu, jnwachukwu@lawyerscommittee.org
Christopher A. Knight, cknight@mayerbrown.com
Geoffrey M. Pipoly, gpipoly@mayerbrown.com
Attorneys for Plaintiffs in Drumwright, et al. v. Cole, et al., 1:20-CV-00998

Dated: June 25, 2021

/s/ Geraldine Sumter

Geraldine Sumter

North Carolina Bar No. 11107

gsumter@fergusonsumter.com

Attorney for Allen Plaintiffs